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February 5, 2025

VIA ECF

Hon. Georgette Castner
United States District Judge
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

RE: *United States of America ex rel. Andriola vs. Ferreira Construction et al.*, No. 3:23-cv-3834-GC-JBD (D.N.J)

Dear Judge Castner:

I represent Relator Michael Andriola in the above-captioned *qui tam* case. Having consulted with defense counsel (Robert C. Scrivo, Esq.), I write on behalf of all parties to respectfully request an amendment of the briefing schedule for Defendants' pending Motion to Dismiss Relator's First Amended Complaint.

As Your Honor may recall, Defendants previously filed a motion to dismiss the original complaint (ECF No. 21) which the Court treated as a request for a pre-motion conference (ECF No. 22). Relator amended his complaint (ECF No. 25) and, following Defendants' letter request for a pre-motion conference and Relator's response (ECF Nos. 26 & 29), the Court set a briefing schedule (Text Order, ECF No. 30).

Because Defendants do not anticipate significant revisions to their previously-filed Motion to Dismiss in seeking dismissal of the amended complaint, and because the parties would like additional time to respond and reply, we respectfully request that the filing deadline be accelerated and the response and reply deadlines extended as follows: Defendants' Motion to Dismiss to be filed February 14, 2025; Relator's Opposition to be filed March 14, 2025, and Defendants' Reply to be filed March 28, 2025.

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We thank Your Honor for considering the parties' request.

Respectfully submitted,

SEIRO HARRISON & NELSON

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